

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

FREDDY PARKER,)	
)	
Plaintiff,)	
)	CIVIL ACTION FILE NO.:
v.)	3:25-cv-00727-JPG
)	
GATEWAY REGIONAL MEDICAL)	
CENTER,)	
)	
Defendant.)	

**DEFENDANT GATEWAY REGIONAL MEDICAL CENTER'S
MOTION TO DISMISS PLAINTIFF FREDDY PARKER'S
FIRST AMENDED COMPLAINT**

Defendant Gateway Regional Medical Center (“Gateway” or “Defendant”), by and through counsel and pursuant to Federal Rule of Civil Procedure 12(b)(6), respectfully moves the Court for an Order dismissing Plaintiff Freddy Parker’s (“Parker” or “Plaintiff”) First Amended Complaint for failure to state a claim. This Motion is accompanied by Gateway’s contemporaneously filed Memorandum of Law, which is incorporated by reference as if fully restated herein.

Respectfully submitted this 5th day of September, 2025.

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Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that I have filed a true and correct copy of the foregoing using the CM/ECF system, which will automatically send e-mail notification of such filing to all counsel of record.

Respectfully submitted this 5th day of September, 2025.

/s/ Erin Pelleteri Howser

Erin Pelleteri Howser

Attorney for Defendant